

# **EXHIBIT A**

No.	Date Range	Type	Authors and/or Recipients	Description	Party Asserting Privilege	Capacity of Other Parties	Basis for Withholding	CWW Objections
3	1/7/2011	Memo	Kenney, Martin; Reichner, Henry; Malin, Mary Catherine; Gresser, James; Hahs, Ona; Katwan, Ron; Little, James	Confidential memo from Commissioner's attorneys to State Department re immunity issues in PA Action	Kenney as attorney for Commissioner and Liberia (Work-Product Doctrine; Litigation Privilege); Kenney on behalf of client, Liberia and Commissioner (Intergovernmental Communication)	Reichner (Commissioner); Malin (State); Gresser (State); Hahs (State); Katwan (State); Little (MKS)	Work-Product Doctrine; Litigation Privilege; Intergovernmental Communication	Communication with State Department; CWW substantial need and undue hardship
4	2/13/2011	Email	Kenney, Martin; Lilly, Joseph; Bagalini, John; Little, James; Lohman, Samuel	Confidential communication among attorneys, including attorney for Commissioner, attorney for CCI, and Echemus director re respective roles of counsel and handling of fees	Kenney as attorney for the Commissioner (Work-Product Doctrine; Litigation Privilege); Lilly as attorney for CCI (Work-Product Doctrine; Litigation Privilege); Kenney and Lilly as parties possessing confidential business information related to CCI (Nevis Act)	Little (Echemus); Bagalini (MKS); Lohman (self & Commissioner)	Work-Product Doctrine; Common-Interest/Joint-Defense Privilege; Litigation Privilege; Nevis Act ("Nevis Act")	Crime-fraud exception (CCI); Crime-fraud exception (Echemus); Terms of attorney retention; CWW substantial need and undue hardship
5	2/10/2011-2/11/2011	Email	Kenney, Martin; Lilly, Joseph; Little, James; Bagalini, John	Confidential communication between attorney for Commissioner, CCI attorney and Echemus directors re draft letter for Commissioner re case handling arrangements and limitations	Kenney as attorney for the Commissioner (Work-Product Doctrine; Litigation Privilege); Lilly as attorney for CCI (Work-Product Doctrine; Litigation Privilege); Kenney and Lilly as parties possessing confidential business information related to CCI (Nevis Act)	Little (Echemus); Bagalini (Echemus); Lilly (CCI)	Work-Product Doctrine; Common-Interest/Joint-Defense Privilege; Litigation Privilege; Nevis Act	Crime-fraud exception (CCI); Crime-fraud exception (Echemus); Reliance on foreign law; Used to refresh witness recollection; CWW substantial need and undue hardship
6	2/11/2011	Draft Letter	Kenney, Martin; Lilly, Joseph; Little, James	Confidential draft of letter from Commissioner to Echemus Board drafted by CCI attorney and conveyed for review to Echemus director re case handling arrangements and limitations	Kenney as attorney for the Commissioner (Work-Product Doctrine; Litigation Privilege); Lilly as attorney for CCI (Work-Product Doctrine; Litigation Privilege); Kenney and Lilly as parties possessing confidential business information related to CCI (Nevis Act)	Little (Echemus)	Work-Product Doctrine; Common-Interest/Joint-Defense Privilege; Litigation Privilege; Nevis Act	Crime-fraud exception (CCI); Crime-fraud exception (Echemus); Reliance on foreign law; Used to refresh witness recollection; CWW substantial need and undue hardship
7	2/10/2011	Legal Opinion	Kenney, Martin; Lilly, Joseph; Little, James	Confidential legal opinion from CCI attorney to Echemus board, reflecting work-product of Commissioner's attorney and confidential business information	Kenney as attorney for the Commissioner (Work-Product Doctrine; Litigation Privilege); Lilly as attorney for CCI (Work-Product Doctrine; Litigation Privilege); Kenney and Lilly as parties possessing confidential business information related to CCI (Nevis Act)	Little (Echemus)	Work-Product Doctrine; Common-Interest/Joint-Defense Privilege; Litigation Privilege; Nevis Act	Crime-fraud exception (CCI); Crime-fraud exception (Echemus); Reliance on foreign law; Used to refresh witness recollection
12	2006-2011	Financial Statements	Kenney, Martin; Harrigan, Glenn; Bagalini, John; Little, James	CCI's confidential Financial Statements from 2006-2011	Kenney as a party possessing confidential business information related to CCI (Nevis Act)	Harrigan (CCI); Bagalini (MKS); Little (Echemus)	Nevis Act	Reliance on foreign law; Crime-fraud exception (CCI); Crime-fraud exception (Kenney); Crime-fraud exception (Echemus)
13	2011	Financials	Kenney, Martin; Harrigan, Glenn; Bagalini, John; Little, James	CCI's confidential Financials	Kenney as a party possessing confidential business information related to CCI (Nevis Act)	Harrigan (CCI); Bagalini (MKS); Little (Echemus)	Nevis Act	Reliance on foreign law; Crime-fraud exception (CCI); Crime-fraud exception (Kenney); Crime-fraud exception (Echemus)
16	11/14/2011	Email	Kenney, Martin; Little, James; Bagalini, John	Confidential communication re structure of CCI shares	Kenney as a party possessing confidential business information related to CCI (Nevis Act)	Little (Echemus); Bagalini (Echemus)	Nevis Act	Reliance on foreign law; Crime-fraud exception (CCI); Crime-fraud exception (Echemus)
36	2/23/2011	Email	Little, James; Kenney, Martin; Lilly, Joseph; Reichner, Henry; Gottlieb, Mark; Lohman, Samuel; Pillsbury, William; Breene, Paul; Bagalini, John	Confidential communication between CCI counsel and Echemus director made for purpose of obtaining/providing legal advice re interest statute for judgments, copying common-interest parties	Lilly as attorney for CCI	Little (Echemus); Kenney (Commissioner); Reichner (Commissioner); Breene (Commissioner); Lohman (self & Commissioner); Gottlieb (Lohman); Pillsbury (Lohman); Bagalini (MKS/Commissioner)	Work-Product Doctrine; Common-Interest/Joint-Defense Privilege; Litigation Privilege	Crime-fraud exception (CCI); Crime-fraud exception (Echemus); CWW substantial need and undue hardship

CWW Objections to Materiality Privilege Log of February 15, 2013								
No.	Date Range	Type	Authors and/or Recipients	Description	Party Asserting Privilege	Capacity of Other Parties	Basis for Withholding	CWW Objections
54	1/10/2011	Email	Little, James; Kenney, Martin; Gresser, James; Reichner, Henry; Malin, Mary Catherine	Confidential communication between Commissioner's attorneys, State Department and consultant re immunity issues in PA Action	Kenney as attorney for Commissioner and Liberia	Little (MKS/Commissioner); Gresser (State); Reichner (Commissioner); Malin (State)	Work-Product Doctrine; Litigation Privilege; Intergovernmental Communication	Communication with State Department; CWW substantial need and undue hardship
71	11/11/2010	Report of Board	Kenney, Martin; Bagalini, John; Little, James	Notice of CCI Board Meeting and Report to Board of Directors of CCI by Commissioner's counsel re events in Cayman, DE and PA Actions	Kenney as attorney for Commissioner (Work-Product Doctrine; Litigation Privilege); Kenney as a party possessing confidential business information related to CCI (Nevis Act)	Little (self & Echemus); Bagalini (MKS/Commissioner)	Work-Product Doctrine; Common-Interest/Joint-Defense Privilege; Litigation Privilege; Nevis Act	Crime-fraud exception (Echemus); Reliance on foreign law; CWW substantial need and undue hardship
93	11/15/2010	Memo	Little, James; Reichner, Henry; Kenney, Martin; Lilly, Joseph; Malin, Mary Catherine; Silski, Andrew; Gresser, James; Hahs, Ona; Katwan, Ron	Confidential memo to State Department from Commissioner's attorneys re immunity issues in PA Action, drafted in collaboration with consultants and common-interest parties and reflecting communications with client made for purpose of obtaining/providing legal advice	Kenney as attorney for Commissioner and Liberia (Work-Product Doctrine; Litigation Privilege; Liberian Constitutional Privilege); Kenney on behalf of clients, Liberia and Commissioner (Intergovernmental Communication; Attorney-Client Privilege)	Little (MKS/Commissioner); Reichner (Commissioner); Lilly (MKS/Commissioner); Malin (State); Silski (State); Gresser (State); Hahs (State); Katwan (State)	Attorney-Client Privilege; Liberian Constitutional Privilege; Work-Product Doctrine; Common-Interest/Joint-Defense Privilege; Litigation Privilege; Intergovernmental Communication	Communication with State Department; Reliance on foreign law; CWW substantial need and undue hardship
111	7/31/2008	Email	Kenney, Martin; Lilly, Joseph; Lohman, Samuel; Diamond, Amy; White, Steve; Little, James	Confidential communication between consultant and Delaware Department of Insurance re information relating to ACE purchase of CIGNA, revealing attorney strategy and made at request of, and forwarded to, Commissioner's attorneys	Kenney as attorney for Commissioner	Lilly (MKS/Commissioner); Diamond (MKS/Commissioner); White (State of DL); Little (MKS/Commissioner); Lohman (self & Commissioner)	Work-Product Doctrine; Common-Interest/Joint-Defense Privilege; Litigation Privilege	Communication with State of Delaware; CWW substantial need and undue hardship
116	11/15/2010	Email	Little, James; Kenney, Martin; Reichner, Henry; Gottlieb, Mark; Lohman, Samuel; Lilly, Joseph; Bagalini, John; Malin, Mary Catherine; Silski, Andrew; Gresser, James; Hahs, Ona; Schwartz, Jonathon; Townley, Stephen; Katwan, Ron	Confidential communication between Commissioner's attorneys and State Department re immunity issues, copying consultants	Kenney as attorney for Commissioner and Liberia (Work-Product Doctrine; Litigation Privilege); Kenney on behalf of clients, Liberia and Commissioner (Intergovernmental Communication)	Little (MKS/Commissioner); Lohman (self & Commissioner); Diamond (MKS/Commissioner); Reichner (Commissioner); Gottlieb (Lohman); Lilly (MKS/Commissioner); Bagalini (MKS/Commissioner); Malin (State); Gresser (State); Silski (State); Hahs (State); Schwartz (State); Townley (State); Katwan (State)	Work-Product Doctrine; Common-Interest/Joint-Defense Privilege; Litigation Privilege, Intergovernmental Communication	Communication with State Department; CWW substantial need and undue hardship
131	10/1/2010 - 10/27/2010	Email	Little, James; Kenney, Martin; Reichner, Henry; Gresser, James; Hahs, Ona; Malin, Mary Catherine; Katwan, Ron	Confidential communication between the Commissioner's attorneys and State Department re immunity issue in PA Action	Kenney as attorney for Commissioner and Liberia (Work-Product Doctrine; Litigation Privilege); Kenney on behalf of clients, Liberia and Commissioner (Intergovernmental Communication)	Little (MKS/Commissioner); Reichner (Commissioner); Gresser (State); Hahs (State); Malin (State); Katwan (State)	Work-Product Doctrine; Common-Interest/Joint-Defense Privilege; Litigation Privilege; Intergovernmental Communication	Communication with State Department; CWW substantial need and undue hardship
157	1/8/2010	Email	Lilly, Joseph; Kenney, Martin; Bagalini, John; Lohman, Samuel	Confidential communication re amended (to address Senesie's replacement with Sesay) retention agreement between Commissioner and attorneys	Lilly as attorney for CCI and Kenney as attorney for self (Work-Product Doctrine; Litigation Privilege); Lilly on behalf of CCI and Kenney for self (Attorney-Client Privilege)	Lilly (CCI); Lohman (self); Bagalini (MKS)	Attorney-Client Privilege; Work-Product Doctrine; Common-Interest/Joint-Defense Privilege; Litigation Privilege; Nevis Act	Crime-fraud exception (CCI); Crime-fraud exception (Lohman); Crime-fraud exception (Kenney); Reliance on foreign law; CWW substantial need and undue hardship
158	1/8/2010	Draft Agreement	Lilly, Joseph; Kenney, Martin; Bagalini, John; Lohman, Samuel	Confidential draft of amended (to address Senesie's replacement with Sesay) retention agreement between Commissioner and attorneys, containing privileged information including, attorney-client communications, litigation goals and strategy	Lilly as attorney for CCI and Kenney as attorney for self (Work-Product Doctrine; Litigation Privilege) and Lilly on behalf of CCI and Kenney for self (Attorney-Client Privilege)	Lilly (CCI); Lohman (self); Bagalini (MKS)	Attorney-Client Privilege; Liberian Constitutional Privilege; Work-Product Doctrine; Common-Interest/Joint-Defense Privilege; Litigation Privilege	Crime-fraud exception (CCI); Crime-fraud exception (Lohman); Crime-fraud exception (Kenney); Reliance on foreign law; CWW substantial need and undue hardship

CWW Objections to Materiality Privilege Log of February 13, 2013									
No.	Date Range	Type	Authors and/or Recipients	Description	Party Asserting Privilege	Capacity of Other Parties	Basis for Withholding	CWW Objections	
159	1/8/2010	Redline of Draft Agreement	Lilly, Joseph; Kenney, Martin; Bagalini, John; Lohman, Samuel	Confidential redline of draft of amended (to address Senesie's replacement with Sesay) retention agreement between Commissioner and attorneys, containing privileged information including, attorney-client communications, litigation goals and strategy	Lilly as attorney for CCI and Kenney as attorney for self (Work-Product Doctrine; Litigation Privilege) and Lilly on behalf of CCI and Kenney for self (Attorney-Client Privilege)	Lilly (CCI); Lohman (self); Bagalini (MKS)	Attorney-Client Privilege; Liberian Constitutional Privilege; Work-Product Doctrine; Common-Interest/Joint- Defense Privilege; Litigation Privilege	Crime-fraud exception (CCI); Crime-fraud exception (Lohman); Crime-fraud exception (Kenney); Reliance on foreign law; CWW substantial need and undue hardship	
211	9/9/2010-9/16/2010	Email	Kenney, Martin; Bagalini, John; Lilly, Joseph; Little, James;	Confidential communication between Echemus directors and CCI attorney, reflecting attorney's thoughts and mental impressions re draft documents for CCI Board meeting made in anticipation of litigation	Kenney as attorney for the Commissioner (Work-Product Doctrine; Litigation Privilege); Lilly as attorney for CCI (Work-Product Doctrine; Litigation Privilege); Kenney and Lilly as parties possessing confidential business information related to CCI (Nevis Act)	Bagalini (MKS/Commissioner); Lilly (CCI); Little (Echemus)	Work-Product Doctrine; Common-Interest/Joint-Defense Privilege; Litigation Privilege; Nevis Act	Crime-fraud exception (CCI); Crime-fraud exception (Echemus); Reliance on foreign law; CWW substantial need and undue hardship	
231	7/19/2010	Email	Kenney, Martin; Harrigan, Glenn; Lilly, Joseph; Lohman, Samuel; Bagalini, John; Little, James	Confidential communication from the Commissioner's attorneys and CCI attorney to CCI director re Commissioner's letter with its attorneys, made for the purpose of providing/obtaining legal advice	Kenney as attorney for the Commissioner (Work-Product Doctrine; Litigation Privilege); Lilly for CCI (Work-Product Doctrine; Litigation Privilege); Kenney and Lilly as parties possessing confidential business information related to CCI (Nevis Act)	Harrigan (CCI); Bagalini (MKS); Little (Echemus); Lilly (CCI); Lohman (self & Commissioner)	Work-Product Doctrine; Common-Interest/Joint-Defense Privilege; Litigation Privilege; Nevis Act	Crime-fraud exception (CCI); Reliance on foreign law; CWW substantial need and undue hardship	
232	7/1/2010	Letter	Kenney, Martin; Harrigan, Glenn; Lilly, Joseph; Lohman, Samuel; Bagalini, John; Ananaba, Charles; Sesay, Foday; Little, James; Abi Jaoudi	Confidential retention letter of Commissioner's attorneys to Commissioner, made for the purpose of providing/obtaining legal advice and reflecting attorney strategy	Lilly as attorney for CCI; Kenney as attorney for MKS (Work-Product Doctrine; Litigation Privilege; Liberian Constitutional Privilege); Kenney on behalf of client, MKS, and Lilly on behalf of client, CCI) (Attorney-Client Privilege); Kenney and Lilly as parties possessing confidential business information related to CCI (Nevis Act)	Harrigan (CCI); Bagalini (MKS); Little (Echemus); Lilly (CCI); Lohman (self & Commissioner); Sesay (Liberia); Ananaba (G22); Abi Jaoudi (self)	Attorney-Client Privilege; Liberian Constitutional Privilege; Work-Product Doctrine; Common-Interest/Joint- Defense Privilege; Litigation Privilege; Nevis Act	Crime-fraud exception (CCI); Crime-fraud exception (Echemus); Crime-fraud exception (Kenney); Crime-fraud exception (Lohman); Crime-fraud exception (AJA); Terms of attorney retention; reliance on foreign law; CWW substantial need and undue hardship	
234	9/24/2010	Memo	Kenney, Martin; Little, James; Bagalini, John; Lohman, Samuel; Chesson-Wureh, Yvette	Confidential talking points for meeting with Liberian President, reflecting legal advice	Kenney as attorney for Commissioner and Liberia (Work-Product Doctrine; Litigation Privilege; Liberian Constitutional Privilege); Kenney on behalf of clients, Liberia and Commissioner (Attorney-Client Privilege)	Little (MKS/Commissioner); Bagalini (MKS/Commissioner); Lohman (self & Commissioner); Chesson-Wureh (Liberia)	Attorney-Client Privilege; Liberian Constitutional Privilege; Work-Product Doctrine; Common-Interest/Joint- Defense Privilege; Litigation Privilege	Crime-fraud exception (Lohman); Reliance on foreign law; CWW substantial need and undue hardship	
239	5/12/2010	Email	Kenney, Martin; Lohman, Samuel; Lilly, Joseph; Little, James; Bagalini, John	Communication between Commissioner's attorneys, consultants and common-interest parties re Cayman Action, reflecting communications with Commissioner and common-interest parties in Liberia made for purpose of obtaining/providing legal advice	Kenney as attorney for Commissioner and Liberia (Work-Product Doctrine; Litigation Privilege; Liberian Constitutional Privilege); Kenney on behalf of clients, Liberia and Commissioner (Attorney-Client Privilege)	Lohman (self & Commissioner); Bagalini (MKS/Commissioner); Little (Echemus); Lilly (MKS/Commissioner & CCI)	Attorney-Client Privilege; Liberian Constitutional Privilege; Work-Product Doctrine; Common-Interest/Joint- Defense Privilege; Litigation Privilege	Crime-fraud exception (CCI); Crime-fraud exception (Echemus); Crime-fraud exception (Lohman); Reliance on foreign law; CWW substantial need and undue hardship	
244	11/2/2010-11/3/2010	Email	Kenney, Martin; Lohman, Samuel; Reichner, Henry; Little, James; Gottlieb, Mark; Lilly, Joseph; Bagalini, John; Malin, Mary Catherine; Gresser, James	Confidential communication between State Department and Commissioner's attorneys re immunity issues in PA Action	Kenney as attorney for Commissioner and Liberia (Work-Product Doctrine; Litigation Privilege); Kenney on behalf of clients, Liberia and Commissioner (Intergovernmental Communication)	Lohman (self, Commissioner & Liberia); Lilly (MKS/Commissioner); Little (MKS/Commissioner); Gottlieb (Lohman); Reichner (Commissioner) Bagalini (MKS/Commissioner); Gresser (State); Malin (State)	Work-Product Doctrine; Common-Interest/Joint-Defense Privilege; Litigation Privilege; Intergovernmental Communication	Communication with state department; CWW substantial need and undue hardship	
253	10/13/2010-10/14/2010	Email	Kenney, Martin; Reichner, Henry; Lilly, Joseph; Bagalini, John; Little, James	Confidential communication between Commissioner's attorneys and common-interest parties re cost of litigating in various scenarios, reflecting attorney strategy	Kenney as attorney for Commissioner	Reichner (Commissioner); Bagalini (MKS/Commissioner); Lilly (CCI); Little (Echemus)	Work-Product Doctrine; Common-Interest/Joint-Defense Privilege; Litigation Privilege	Crime-fraud exception (CCI); Crime-fraud exception (Echemus); CWW substantial need and undue hardship	

CWW Objections to Motion Kenney's Privilege Log of February 13, 2013									
No.	Date Range	Type	Authors and/or Recipients	Description	Party Asserting Privilege	Capacity of Other Parties	Basis for Withholding	CWW Objections	
266	10/30/2008	Memo	Kenney, Martin; Little, James; Stewart, Malcolm	Confidential memo to potential investor re M. Kenney's past experience, reflecting attorney thoughts and mental impressions re various cases	Kenney as attorney for Commissioner	Little (investment vehicle); Stewart (MKS)	Work-Product Doctrine; Litigation Privilege	Communication with potential investor; CWW substantial need and undue hardship	
267	11/25/2005	Memo	Kenney, Martin; Hacker, Richard; Wise, Daniel; Bagalini, John; McGunn, James; Lohman, Samuel; O'Brien, Elizabeth	Confidential memo to potential investor re cases for potential investment vehicle, reflecting attorney thoughts and mental impressions re Abi Jaoudi Liberian Judgment	Kenney as attorney Abi Jaoudi	Hacker (MKS/Abi Jaoudi); Wise (MKS/Abi Jaoudi); Bagalini (MKS/Abi Jaoudi); McGunn (MKS/Abi Jaoudi); Lohman (MKS/Abi Jaoudi); O'Brien (MKS/Abi Jaoudi)	Work-Product Doctrine; Litigation Privilege	Communication with potential investor; Crime-fraud exception (Kenney); Crime-fraud exception (AJA); CWW substantial need and undue hardship	
270	3/28/2009	Memo	Kenney, Martin; Little, James; Stewart, Malcolm	Confidential memo to potential investor re M. Kenney's past experience, reflecting attorney thoughts and mental impressions from re Cayman Action	Kenney as attorney for Commissioner	Little (investment vehicle); Stewart (investment vehicle)	Work-Product Doctrine; Litigation Privilege	Communication with potential investor; CWW substantial need and undue hardship	
271	7/16/2009	Memo	Kenney, Martin; Little, James; Stewart, Malcolm	Confidential memo to potential investor re M. Kenney's past experience, reflecting attorney thoughts and mental impressions re various cases	Kenney as attorney for Commissioner	Little (investment vehicle); Stewart (investment vehicle)	Work-Product Doctrine; Litigation Privilege	Communication with potential investor; CWW substantial need and undue hardship	
272	8/30/2009	Memo	Kenney, Martin; Little, James; Stewart, Malcolm	Confidential memo to potential investor re M. Kenney's past experience, reflecting attorney thoughts and mental impressions re various cases	Kenney as attorney for Commissioner	Little (investment vehicle); Stewart (investment vehicle)	Work-Product Doctrine; Litigation Privilege	Communication with potential investor; CWW substantial need and undue hardship	
273	Jul-09	Draft Letter	Kenney, Martin; Lohman Samuel; Little, James	Confidential draft letter from Samuel Lohman to Martin Kenney re Abi Jaoudi case, reflecting attorney thoughts and mental impressions	Kenney as attorney for Commissioner	Little (investment vehicle); Lohman (Commissioner)	Work-Product Doctrine; Litigation Privilege	Communication with potential investor; CWW substantial need and undue hardship	
283	4/25/2007	Agreement	Lilly, Joseph; MKS; LFL; Commissioner Senesie, Ananaba, Charles; Little, James; Burford Capital Ltd. ("Burford"); CCP Financial Consultants Ltd. ("CCP")	International Claims Enforcement and Funding Agreement between Commissioner and CC International, Ltd. ("CCI"), reflecting attorney work-product and confidential communications with client	Lilly as attorney for CCI; MKS as attorney for Commissioner	MKS (Commissioner); LFL (Commissioner); Commissioner Senesie (Liberia); Ananaba (G22 & Abi Jaoudi); Little (Echemus); Burford (self); CCP (CCI)	Nevis Act; Work-Product Doctrine; Attorney-Client Privilege; Joint- Defense Common Interest Privilege; Litigation Privilege	Crime-fraud exception (CCI); Crime-fraud exception (Echemus); Crime-fraud exception (AJA); Reliance on foreign law; Communication with potential investor; CWW substantial need and undue hardship	
284	7/1/2010	Agreement	Lilly, Joseph; MKS; LFL; Commissioner Sesay; Ananaba, Charles; Little, James; Burford; CCP	First Amendment to International Claims Enforcement and Funding Agreement, reflecting attorney work-product and confidential communications with client	Lilly as attorney for CCI; MKS as attorneys for Commissioner	MKS (Commissioner); LFL (Commissioner); Commissioner Sesay (Liberia); Ananaba (G22 & Abi Jaoudi); Little (Echemus); Burford (self); CCP (CCI)	Nevis Act; Work-Product; Attorney- Client; Common-Interest; Joint- Defense/Common Interest Privilege; Litigation Privilege	Crime-fraud exception (CCI); Crime-fraud exception (Echemus); Crime-fraud exception (AJA); Crime-fraud exception (Lohman); Communication with potential investor; Funding agreement; Reliance on foreign law; CWW substantial need and undue hardship	
285	4/25/2007	Letter of Engagement	Lilly, Joseph; MKS; LFL; Commissioner Senesie	Letter of Engagement between MKS, LFL and Commissioner Senesie, reflecting legal strategy and confidential attorney-client communications	Lilly as attorney for CCI (Nevis Act); MKS as attorney for the Commissioner (Nevis Act; Work-Product Doctrine; Attorney-Client Privilege; Joint-Defense Common Interest Privilege; Litigation Privilege)	MKS (self); LFL (self); Commissioner Senesie (Liberia)	Nevis Act; Work-Product Doctrine; Attorney-Client Privilege; Joint- Defense Common Interest Privilege; Litigation Privilege	Crime-fraud exception (CCI); Crime-fraud exception (Kenney); Crime-fraud exception (Lohman); Terms of attorney retention; Reliance on foreign law; CWW substantial need and undue hardship	
286	3/15/2006	Agreement	Lilly, Joseph; CCI; MKS; LFL; CCI Investments Ltd. ("CCI Investments"); Abi Jaoudi; Ananaba, Charles	Agreement between Kenney (as trustee for third-party investor) and CCI re purchase of shares, including promissory note from Kenney to CCI, guarantee by third-party investor of Kenney's obligations and escrow agreement, reflecting Lilly's work- product and communications with client	Lilly as attorney for CCI	CCI (self); MKS (self); LFL (Commissioner); CCI Investments (self); Abi Jaoudi (self); Ananaba (G22)	Nevis Act; Work-Product Doctrine; Attorney-Client Privilege; Joint- Defense Common Interest Privilege; Litigation Privilege	Crime-fraud exception (CCI); Crime-fraud exception (Kenney); Crime-fraud exception (AJA); Funding agreement; CWW substantial need and undue hardship	
287	2/22/2007	Agreement	Lilly, Joseph; MKS; LFL; Ananaba, Charles; Abi Jaoudi; Commissioner Senesie	Memorandum of Understanding between Commissioner of Insurance and CCI	Lilly and MKS as attorneys for CCI	MKS (CCI); LFL (CCI); Ananaba (G22); Abi Jaoudi (self); Commissioner Senesie (Liberia)	Nevis Act; Work-Product Doctrine; Attorney-Client Privilege; Joint- Defense Common Interest Privilege; Litigation Privilege	Crime-fraud exception (CCI); Crime-fraud exception (AJA); Funding agreement; Reliance on foreign law; CWW substantial need and undue hardship	
288	12/19/2005	Chart	Lilly, Joseph; MKS; LFL; Abi Jaoudi; Ananaba, Charles; CCI Investments	Charts of claims and potential recoveries, included in CCI offering information binder	Lilly as attorney for CCI	MKS (Abi Jaoudi); LFL (Abi Jaoudi & G22); Abi Jaoudi (self); Ananaba (G22); CCI Investments (self)	Nevis Act	Reliance on foreign law; Crime-fraud exception (CCI); Crime-fraud exception (AJA)	

CWW Objections to Marjorie Kenney's Privilege Log of February 13, 2013								
No.	Date Range	Type	Authors and/or Recipients	Description	Party Asserting Privilege	Capacity of Other Parties	Basis for Withholding	CWW Objections
289	1/28/2005	Agreement	Lilly, Joseph; MKS; LFL; St. Cleer LLC ("St. Cleer"); Abi Jaoudi; Ananaba, Charles	Copy of assignment of proceeds of claims from Abi Jaoudi to St Cleer LLC, containing confidential attorney-client communications and work-product	Lilly as attorney for CCI (Nevis Act); LFL as attorney for Abi Jaoudi (Nevis Act; Work- Product Doctrine; Attorney- Client Privilege; Joint- Defense Common Interest Privilege; Litigation Privilege)	MKS (Abi Jaoudi); LFL (Abi Jaoudi & G22); St. Cleer (self); Abi Jaoudi (self); Ananaba (G22)	Nevis Act; Work-Product Doctrine; Attorney-Client Privilege; Joint- Defense Common Interest Privilege; Litigation Privilege	Crime-fraud exception (CCI); Crime-fraud exception (AJA); Funding agreement; Reliance on foreign law; CWW substantial need and undue hardship
290	1/21/2005	Agreement	Lilly, Joseph; MKS; LFL; St. Cleer; Abi Jaoudi; Ananaba, Charles	Copy of assignment of proceeds of claims from Ananaba to St Cleer LLC, containing confidential attorney-client communications and work-product	Lilly as attorney for CCI (Nevis Act); LFL as attorney for Abi Jaoudi (Nevis Act; Work- Product Doctrine; Attorney- Client Privilege; Joint- Defense Common Interest Privilege; Litigation Privilege)	MKS (Abi Jaoudi); LFL (Abi Jaoudi & G22); St. Cleer (self); Abi Jaoudi (self); Ananaba (G22)	Nevis Act; Work-Product Doctrine; Attorney-Client Privilege; Joint- Defense Common Interest Privilege; Litigation Privilege	Crime-fraud exception (CCI); Crime-fraud exception (AJA); Funding agreement; Reliance on foreign law; CWW substantial need and undue hardship
291	1/10/2007	Draft Agreeeme	Lilly, Joseph; MKS; LFL	Draft Shareholders Agreement for CCI, reflecting attorney work-product and confidential communications with CCI	Lilly and MKS as attorneys for CCI	MKS (CCI); LFL (CCI)	Nevis Act; Work-Product; Attorney- Client; Common-Interest; Joint- Defense/Common Interest Privilege; Litigation Privilege	Crime-fraud exception (CCI); Funding agreement; Reliance on foreign law; CWW substantial need and undue hardship
292	4/27/2005	Consent Award	Lilly, Joseph; LFL; MKS; Ananaba, Charles; Abi Jaoudi; St. Cleer	Swiss arbitration consent award between St. Cleer, LFL, MKS, CCI and G22	Lilly as attorney for CCI	LFL (self); MKS (self); Ananaba (G22); Abi Jaoudi (self); St. Cleer (self)	Nevis Act; Swiss Law	Reliance on foreign law; Crime-fraud exception (CCI); Crime-fraud exception (AJA); Crime-fraud exception (Kenney); Crime-fraud exception (Lohman)
293	11/1/2009	Agreement	Lilly, Joseph; MKS; LFL; Ananaba, Charles; Abi Jaoudi; CCI Investments	Agreement between Abi Jaoudi and G22 regarding distribution of recovery	Lilly as attorney for CCI	MKS (Commissioner); LFL (Commissioner); Ananaba (G22); Abi Jaoudi (self); CCI Investments (self)	Nevis Act	Reliance on foreign law; Crime-fraud exception (CCI); Crime-fraud exception (AJA)
294	6/30/2005	Agreement	Lilly, Joseph; St. Cleer; Ananaba; Abi Jaoudi	Amendment and Continuation of Agreement	Lilly as attorney for CCI	St. Cleer (self); Ananaba (G22); Abi Jaoudi (self)	Nevis Act	Reliance on foreign law; Crime-fraud exception (CCI); Crime-fraud exception (AJA)
295	11/1/2009	Agreement	Lilly, Joseph; LFL; MKS; Ananaba, Charles; Abi Jaoudi; CCP; CCI Investments	Addendum to Agreement of Final Settlement and Compromise between LFL, MKS, Abi Jaoudi, Ananaba and CCI Investments	Lilly as attorney for CCI	LFL (self); MKS (self); Ananaba (G22); Abi Jaoudi (self); CCP (CCI); CCI Investments (self)	Nevis Act; Swiss Law	Reliance on foreign law; Crime-fraud exception (CCI); Crime-fraud exception (AJA); Crime-fraud exception (Kenney); Crime-fraud exception (Lohman)
296	10/20/2006	Agreement	Lilly, Joseph; LFL; MKS; St. Cleer; Ananaba, Charles; Abi Jaoudi; CCI Investments	Final Settlement and Compromise between LFL, MKS, Abi Jaoudi, Ananaba and CCI Investments	Lilly as attorney for CCI	LFL (self & St. Cleer); MKS (self); St. Cleer (self); Ananaba (G22); Abi Jaoudi (self); CCI Investments (self)	Nevis Act; Swiss Law	Reliance on foreign law; Crime-fraud exception (CCI); Crime-fraud exception (AJA); Crime-fraud exception (Kenney); Crime-fraud exception (Lohman)
297	3/15/2006	Agreement	Lilly; MKS; Abi Jaoudi; Ananaba, Charles; LFL; CCP	Shareholder Agreement between CCI shareholders re rights and obligations	Lilly as attorney for CCI; MKS as attorneys for Commissioner	MKS (CCI); Abi Jaoudi (self); Ananaba (G22 & Abi Jaoudi); LFL (CCI); CCP (CCI)	Nevis Act; Work-Product Doctrine; Attorney-Client Privilege; Joint- Defense Common Interest Privilege; Litigation Privilege	Crime-fraud exception (CCI); Crime-fraud exception (AJA); Funding agreement; Reliance on foreign law; CWW substantial need and undue hardship
298	6/30/2006	Agreement	Lilly, Joseph; MKS; CCI; CCI Investments; CCP	Assignment and Assumption Agreement between CCI, Kenney and CCI Investments	Lilly as attorney for CCI	MKS (self); CCI (self); CCI Investments (self); CCP (CCI)	Nevis Act	Reliance on foreign law; Crime-fraud exception (CCI); Crime-fraud exception (Kenney)

Begin Bates	End Bates	Date	Type	Authors/Recipients	Description	Party Asserting Privilege	Capacity of Other Parties	Basis for Withholding	CWW Objections
JCL_JB_0003601	JCL_JB_0003608	10/29/2010	Invoice	Kenney, Martin; Little, James; Bagalini, John	Invoice of Martin Kenney & Co. Solicitors to Commissioner for work performed on Cayman Action, reflecting attorney strategy in same	Kenney as attorney for Commissioner	Little (Echemus); Bagalini (MKS/Commissioner)	Work-Product; Litigation Privilege	Crime-fraud exception (Echemus); CWW substantial need and undue hardship
JCL_JB_0003591	JCL_JB_0003600	11/22/2010	Invoice	Kenney, Martin; Little, James; Bagalini, John	Invoice of Martin Kenney & Co. Solicitors to Commissioner for work performed on Cayman Action, reflecting attorney strategy in same	Kenney as attorney for Commissioner	Little (Echemus); Bagalini (MKS/Commissioner)	Work-Product; Litigation Privilege	Crime-fraud exception (Echemus); CWW substantial need and undue hardship
JCL_JB_0003581	JCL_JB_0003590	12/13/2010	Invoice	Kenney, Martin; Little, James; Bagalini, John	Invoice of Martin Kenney & Co. Solicitors to Commissioner for work performed on Cayman Action, reflecting attorney strategy in same	Kenney as attorney for Commissioner	Little (Echemus); Bagalini (MKS/Commissioner)	Work-Product; Litigation Privilege	Crime-fraud exception (Echemus); CWW substantial need and undue hardship
JCL_MK_0000020 JCL_MK_0000022 JCL_MK_0000024 JCL_MK_0000026	JCL_MK_0000021 JCL_MK_0000023 JCL_MK_0000025 JCL_MK_0000026	2/16/2011- 2/17/2011	Email	Kenney, Martin; Bagalini, John; Little, James; Lilly, Joseph	Email among Echemus directors, Commissioner's attorney and CCI attorney re changes to claims handling, corporate restructuring and Third Circuit matters	Lilly as attorney for CCI (Work Product and Litigation Privilege) and Kenney and Lilly as parties in possession of confidential information re CCI (Nevis Act)	Little (Echemus); Bagalini (Echemus); Kenney (Commissioner)	Work-Product; Common-Interest/Joint-Defense; Litigation Privilege; St. Christopher & Nevis Confidential Relationships Act	Crime-fraud exception (CCI); Crime-fraud exception (Echemus); Terms of attorney retention; Used to refresh witness recollection; CWW substantial need and undue hardship
JCL_MK_0001786 JCL_MK_0001846	JCL_MK_0001792 JCL_MK_0001852	5/20/2011	Board Meeting Minutes	Lilly, Joseph (drafter); Kenney, Martin; Lohman, Samuel; Bailey, Nigel; Harrigan, Glenn; Little, James	Minutes of May 5, 2012 CCI Board Meeting, reflecting an attorney's presentation on the status of litigation (including Cayman Action, PA Action and DE Action) to common-interest parties	Kenney as attorney for the Commissioner (Liberian Constitutional Privilege; Work-Product Doctrine; Litigation Privilege), Kenney on behalf of the Commissioner (Attorney-Client Privilege) and Kenney and Lilly as parties in possession of confidential information re CCI entity (Nevis Act)	Lilly (CCI); Lohman (self & Commissioner); Bailey (CCI); Harrigan (CCI); Little (Echemus)	Attorney-Client; Liberian Constitutional Privilege; Work-Product; Joint-Defense; Litigation Privilege; St. Christopher & Nevis Confidential Relationships Act	Crime-fraud exception (CCI); Crime-fraud exception (Echemus); Crime-fraud exception (Lohman); Used to refresh witness recollection; CWW substantial need and undue hardship
JCL_MK_0001912	JCL_MK_0001912	2/6/2012	Email	Kenney, Martin; Bagalini, John; Little, James; Lilly, Joseph	Confidential communication between Echemus directors and CCI attorney re case handling and arrangements with Sam Lohman	Lilly as attorney for CCI; Kenney as attorney for Commissioner	Kenney (Echemus/MKS/Commissioner); Little (Echemus); Lilly (CCI); Bagalini (Echemus)	Work-Product Doctrine; Common-Interest/Joint-Defense Privilege; Litigation Privilege St. Christopher & Nevis Confidential Relationships Act	Crime-fraud exception (CCI); Crime-fraud exception (Echemus); CWW substantial need and undue hardship
JCL_MK_0001794 JCL_MK_0001827	JCL_MK_0001795 JCL_MK_0001828	2/27/2012	Email	Kenney, Martin; Bagalini, John; Little, James; Lilly, Joseph	Email containing CCI attorney's mental thoughts and impressions re structuring company and arrangements for G22 claim	Lilly as attorney for CCI	Kenney (Echemus & Commissioner); Bagalini (Echemus); Little (Echemus)	Work-Product; Common-Interest/Joint-Defense; Litigation Privilege; St. Christopher & Nevis Confidential Relationships Act	Crime-fraud exception (CCI); Crime-fraud exception (Echemus); CWW substantial need and undue hardship



## CWW Objections to Joseph Lilly's Privilege Log of February 8, 2013

No.	Date	Type	Authors/Recipients	Description	Party Asserting Privilege	Capacity of Other Parties (Where Applicable)	Basis for Withholding	CWW Objections
1	11/10/2010	Notice of Special Meeting of the CCI Board	Joseph Lilly ("Lilly"); CC International Limited ("CCI") Board	Notice of Special Meeting of CCI Board and Draft Resolution	Lilly as attorney for CCI	CCI Board (self)	St. Christopher & Nevis Confidential Relationships Act ("Nevis Act")	Reliance on foreign law; Crime-fraud exception (CCI)
2	2/28/2005	Minutes	Lilly; Law Firm Lohman ("LFL"); CCI Board; Martin Kenney & Co. Solicitors ("MKS")	Minutes of meeting of Board of Directors, 2/28/05	Lilly as attorney for CCI	LFL (CCI); CCI Board (self); MKS (Abi Jaoudi & Azar Trading Co. ("Abi Jaoudi"))	Nevis Act	Reliance on foreign law; Crime-fraud exception (CCI); Crime-fraud exception (AJA)
3	2/24/2005	Assignment	Lilly; MKS; LFL; CCP Financial Consultants Ltd. ("CCP")	Assignment of Subscription for CCI Stock	Lilly as attorney for CCI	MKS (Abi Jaoudi); LFL (CCI); CCP (CCI)	Nevis Act	Reliance on foreign law; Crime-fraud exception (CCI); Crime-fraud exception (AJA)
4	3/15/2006	Agreement	Lilly; MKS; Abi Jaoudi; Charles Ananaba, ("Ananaba"); LFL; CCP	Shareholder Agreement between CCI shareholders re rights and obligations	Lilly as attorney for CCI and MKS as attorneys for Commissioner	MKS (CCI); Abi Jaoudi (self); Ananaba (G22 & Abi Jaoudi); LFL (CCI); CCP (CCI)	Nevis Act; Work-Product Doctrine; Attorney-Client Privilege; Joint- Defense Common Interest Privilege; Litigation Privilege	Crime-fraud exception (CCI); Crime-fraud exception (AJA); Shareholder agreement; Reliance on foreign law; CWW substantial need and undue hardship
5	6/30/2006	Agreement	Lilly; MKS; CCI; CCI Investments Ltd. ("CCI Investments"); CCP	Assignment and Assumption Agreement between CCI, Kenney and CCI Investments	Lilly as attorney for CCI	MKS (self); CCI (self); CCI Investments (self); CCP (CCI)	Nevis Act	Reliance on foreign law; Crime-fraud exception (CCI); Crime-fraud exception (Kenney)
6	2/25/2005	Letter	Lilly; John Terry of Superior Trust Management; Geneva Trust Management; MKS; LFL	Letter re incorporation of CCI	Lilly as attorney for CCI	Superior Trust (CCI); Geneva Trust (CCI); MKS (Abi Jaoudi); LFL (Abi Jaoudi & G22)	Nevis Act	Reliance on foreign law; Crime-fraud exception (CCI); Crime-fraud exception (AJA)
7	11/1/2009	Agreement	Lilly; LFL; MKS; Ananaba; Abi Jaoudi; CCP; CCI Investments	Addendum to Agreement of Final Settlement and Compromise between LFL, MKS, Abi Jaoudi, Ananaba and CCI Investments	Lilly as attorney for CCI	LFL (self); MKS (self); Ananaba (G22); Abi Jaoudi (self); CCP (CCI); CCI Investments (self)	Nevis Act; Swiss Law	Reliance on foreign law; Crime-fraud exception (CCI); Crime-fraud exception (AJA); Crime-fraud exception (Kenney); Crime-fraud exception (Lohman)
8	10/20/2006	Agreement	Lilly; LFL; MKS; St. Cleer LLC ("St. Cleer"); Ananaba; Abi Jaoudi; CCI Investments	Final Settlement and Compromise between LFL, MKS, Abi Jaoudi, Ananaba and CCI Investments	Lilly as attorney for CCI	LFL (self & St. Cleer); MKS (self); St. Cleer (self); Ananaba (G22); Abi Jaoudi (self); CCI Investments (self)	Nevis Act; Swiss Law	Reliance on foreign law; Crime-fraud exception (CCI); Crime-fraud exception (AJA); Crime-fraud exception (Lohman)
9	6/30/2005	Agreement	Lilly; Ananaba; Abi Jaoudi; MKS; LFL	Amendment and Continuation of January 28, 2005 Agreement between St. Cleer and Abi Jaoudi	Lilly as attorney for CCI	Ananaba (G22); Abi Jaoudi (self); MKS (Abi Jaoudi); LFL (St. Cleer)	Nevis Act	Reliance on foreign law; Crime-fraud exception (CCI); Crime-fraud exception (AJA)
10	11/3/2010	Report	Lilly; MKS; LFL	Report to CCI Board from LFL and MKS re status of global litigation efforts, containing confidential attorney work-product and reflecting confidential attorney-client communications	Lilly as attorney for CCI (Nevis Act); MKS as attorney for the Commissioner (Nevis Act; Work-Product Doctrine; Attorney- Client Privilege; Joint-Defense Common Interest Privilege; Litigation Privilege)	LFL (Commissioner)	Nevis Act; Work-Product Doctrine; Attorney-Client Privilege; Joint- Defense Common Interest Privilege; Litigation Privilege	Crime-fraud exception (CCI); Reliance on foreign law; CWW substantial need and undue hardship
11	3/15/2006	Agreement	Lilly; St. Cleer; MKS; LFL; Ananaba; Abi Jaoudi	Assignment Agreement between St. Cleer and CCI	Lilly as attorney for CCI	St. Cleer (self); MKS (CCI); LFL (CCI); Ananaba (G22); Abi Jaoudi (self)	Nevis Act	Reliance on foreign law; Crime-fraud exception (CCI); Crime-fraud exception (AJA)
12	3/15/2006	Agreement	Lilly; St. Cleer; MKS; LFL; Ananaba; Abi Jaoudi	Assignment Agreement between St. Cleer and CCI	Lilly as attorney for CCI	St. Cleer (self); MKS (CCI); LFL (CCI); Ananaba (G22); Abi Jaoudi (self)	Nevis Act	Reliance on foreign law; Crime-fraud exception (CCI); Crime-fraud exception (AJA)
13	1/12/2007	Minutes	Lilly; LFL; CCP; MKS	Minutes of meeting of CCI Board	Lilly as attorney for CCI	LFL (CCI); CCP (CCI); MKS (CCI)	Nevis Act	Reliance on foreign law; Crime-fraud exception (CCI)
14	2008-2009	Certificates	Lilly; MKS; CCP	Cancelled share certificates	Lilly as attorney for CCI	MKS (Commissioner); CCP (CCI)	Nevis Act	Reliance on foreign law; Crime-fraud exception (CCI)



## CWW Objections to Joseph Lilly's Privilege Log of February 8, 2013

No.	Date	Type	Authors/Recipients	Description	Party Asserting Privilege	Capacity of Other Parties (Where Applicable)	Basis for Withholding	CWW Objections
15	3/1/2010	Financial Statement; Resolutions	Lilly; MKS; LFL; Ananaba; CCP	2009 Financial Statement of CCI and related CCI Board Resolutions	Lilly as attorney for CCI	MKS (Commissioner); LFL (Commissioner); Ananaba (G22 & Abi Jaoudi); CCP (CCI)	Nevis Act	Reliance on foreign law; Crime-fraud exception (CCI); Crime-fraud exception (AJA)
16		Bye-Laws	Lilly; MKS; LFL; CCP	CCI Bye-Laws	Lilly as attorney for CCI	MKS (CCI); LFL (CCI); CCP (CCI)	Nevis Act	Reliance on foreign law; Crime-fraud exception (CCI)
17	2007	Draft Resolution	Lilly	Draft Unanimous Consent of Board of Directors	Lilly as attorney for CCI	n/a	Nevis Act	Reliance on foreign law; Crime-fraud exception (CCI)
18	2008	Financial Statement	Lilly; MKS; LFL; Ananaba; CCP	2007 Financial Statement of CCI	Lilly as attorney for CCI	MKS (Commissioner); LFL (Commissioner); Ananaba (G22 & Abi Jaoudi); CCP (CCI)	Nevis Act	Reliance on foreign law; Crime-fraud exception (CCI); Crime-fraud exception (AJA)
19	7/9/2008	Resolution	Lilly; CCI Board; CCP; MKS	Unanimous Written Consent of CCI Board	Lilly as attorney for CCI	CCI Board (self); CCP (CCI); MKS (Commissioner)	Nevis Act	Reliance on foreign law; Crime-fraud exception (CCI)
20	7/9/2008	Resolution	Lilly; CCI Board; CCP; MKS	Unanimous Written Consent of CCI Board	Lilly as attorney for CCI	CCI Board (self); CCP (CCI); MKS (Commissioner)	Nevis Act	Reliance on foreign law; Crime-fraud exception (CCI)
21	10/20/2006	Certificate	Lilly; LFL; Ananaba; CCP; MKS	Share Certificate	Lilly as attorney for CCI	LFL (CCI); Ananaba (G22); CCP (CCI); MKS (CCI)	Nevis Act	Reliance on foreign law; Crime-fraud exception (CCI)
22	4/2006 - 8/2007	Certificates, Registers, Correspondence	Lilly; LFL; MKS; CCP	Correspondence from LFL to MKS enclosing, share certificates and share registers of CCI	Lilly as attorney for CCI	LFL (pre-April 2007: CCI, post-April 2007); MKS (pre-April 2007: CCI, post-April 2007: Commissioner); CCP (CCI)	Nevis Act	Reliance on foreign law; Crime-fraud exception (CCI)
23	3/22/2010	Agreement	Lilly; Airebil Limited; CCP; MKS	Share Transfer Agreement	Lilly as attorney for CCI	Airebil Limited (self); CCP (CCI); MKS (Commissioner)	Nevis Act	Reliance on foreign law; Crime-fraud exception (CCI)
24	2006-09	Sources & Uses Statement	Lilly; CCI; MKS; LFL; James Little ("Little")	CCI Sources & Uses Statement for 2006-09	Lilly as attorney for CCI	CCI (self); LFL (pre-April 2007: CCI, post-April 2007); MKS (pre-April 2007: CCI, post-April 2007: Commissioner); Little (Echemus)	Nevis Act	Reliance on foreign law; Crime-fraud exception (CCI); Crime-fraud exception (Echemus)
25	2007	Draft Resolution	Lilly	Draft Written Consent of CCI Investments to Election of Director of CCI	Lilly as attorney for CCI	n/a	Nevis Act	Reliance on foreign law; Crime-fraud exception (CCI)
26	8/1/2008	Resolution	Lilly; CCI Board; CCP; MKS	Unanimous Written Consent of CCI Board to Election of Officers	Lilly as attorney for CCI	CCI Board (self); CCP (CCI); MKS (Commissioner)	Nevis Act	Reliance on foreign law; Crime-fraud exception (CCI)
27	4/25/2007	Agreement	Lilly; MKS; LFL; Commissioner Senesie, Ananaba; Little; Burford Capital Ltd. ("Burford"); CCP	International Claims Enforcement and Funding Agreement between Commissioner and CCI, reflecting attorney work-product and confidential communications with client	Lilly as attorney for CCI and MKS as attorney for Commissioner	MKS (Commissioner); LFL (Commissioner); Commissioner Senesie (Liberia); Ananaba (G22 & Abi Jaoudi); Little (Echemus); Burford (self); CCP (CCI)	Nevis Act; Work-Product Doctrine; Attorney-Client Privilege; Joint- Defense Common Interest Privilege; Litigation Privilege	Crime-fraud exception (CCI); Crime-fraud exception (Echemus); Crime-fraud exception (AJA); Communication with potential investor; Funding agreement; Reliance on foreign law; CWW substantial need and undue hardship
28	3/15/2006	Agreement	Lilly; CCI; MKS; LFL; CCI Investments; Abi Jaoudi; Ananaba	Agreement between Kenney (as trustee for third-party investor) and CCI re purchase of shares, including promissory note from Kenney to CCI, guarantee by third-party investor of Kenney's obligations and escrow agreement, reflecting Lilly's work-product and communications with client	Lilly as attorney for CCI	CCI (self); MKS (self); LFL (Commissioner); CCI Investments (self); Abi Jaoudi (self); Ananaba (G22)	Nevis Act; Work-Product Doctrine; Attorney-Client Privilege; Joint- Defense Common Interest Privilege; Litigation Privilege	Crime-fraud exception (CCI); Crime-fraud exception (Kenney); Crime-fraud exception (AJA); Communication with potential investor; Reliance on foreign law; CWW substantial need and undue hardship
29	2/22/2007	Agreement	Lilly; MKS; LFL; Ananaba; Abi Jaoudi; Commissioner	Memorandum of Understanding between Commissioner of Insurance and CCI	Lilly and MKS as attorneys for CCI	MKS (CCI); LFL (CCI); Ananaba (G22); Abi Jaoudi (self); Commissioner Senesie (Liberia)	Nevis Act; Work-Product Doctrine; Attorney-Client Privilege; Joint- Defense Common Interest Privilege; Litigation Privilege	Crime-fraud exception (CCI); Crime-fraud exception (AJA); Funding agreement; Reliance on foreign law; CWW substantial need and undue hardship

CWW Objections to Joseph Lilly's Privilege Log of February 8, 2013								
No.	Date	Type	Authors/Recipients	Description	Party Asserting Privilege	Capacity of Other Parties (Where Applicable)	Basis for Withholding	CWW Objections
30	3/22/2010	Financial Statement; Resolutions	Lilly; MKS; LFL; Ananaba; CCP	2009 Financial Statement of CCI and related resolutions	Lilly as attorney for CCI	MKS (Commissioner); LFL (Commissioner); Ananaba (G22 & Abi Jaoudi); CCP (CCI)	Nevis Act	Reliance on foreign law; Crime-fraud exception (CCI); Crime-fraud exception (AJA)
31	6/30/2006	Resolutions; Offering Summary; Investor Information Form	Lilly; MKS; LFL; CCP; CCI Investments	Resolutions of CCI Investments related to CCI; Excerpts from CCI Offering Summary; CCI Investor Information Form	Lilly as attorney for CCI	MKS (CCI); LFL (CCI); CCP (CCI); CCI Investments (self)	Nevis Act	Reliance on foreign law; Crime-fraud exception (CCI)
32	11/3/2010	Notice and Report	Lilly; MKS; LFL; CCP	Notice of Special Meeting of CCI Board, including as exhibits Report logged at 10 and Agreement and Addendum logged at 7 and 8.	Lilly as attorney for CCI (Nevis Act) and MKS (privileges claimed at 10).	MKS (Commissioner); LFL (Commissioner); CCP (CCI)	Nevis Act; Privileges claimed at 10.	Crime-fraud exception (CCI); Funding agreement; Reliance on foreign law; CWW substantial need and undue hardship
33	1/15/2007	Resolutions	Lilly; CCI Board; CCP; LFL; MKS	Unanimous Written Consent of Liberian Members of CCI to Election of Director and exhibit (limited power of attorney ratifying agreement with St. Cleer, a Nevis entity)	Lilly as attorney for CCI	CCI Board (self); CCP (CCI); LFL (CCI); MKS (CCI)	Nevis Act	Reliance on foreign law; Crime-fraud exception (CCI)
34	1/15/2007	Resolutions	Lilly; CCI Board; CCP; LFL; MKS	Written consent of CCI Investments to Election of Director	Lilly as attorney for CCI	CCI Board (self); CCP (CCI); LFL (CCI); MKS (CCI)	Nevis Act	Reliance on foreign law; Crime-fraud exception (CCI)
35	2007	Draft Resolution	Lilly	Draft of Written Consent of CCI to Election of Director	Lilly as attorney for CCI	n/a	Nevis Act	Reliance on foreign law; Crime-fraud exception (CCI)
37	4/25/2007	Letter of Engagement	Lilly; MKS; LFL; Commissioner Senesie	Letter of Engagement between MKS, LFL and Commissioner Senesie, reflecting legal strategy and confidential attorney-client communications	Lilly as attorney for CCI (Nevis Act) and MKS as attorney for the Commissioner (Nevis Act; Work-Product Doctrine; Attorney-Client Privilege; Joint-Defense Common Interest Privilege; Litigation Privilege)	MKS (self); LFL (self); Commissioner Senesie (Liberia)	Nevis Act; Work-Product Doctrine; Attorney-Client Privilege; Joint-Defense Common Interest Privilege; Litigation Privilege	Crime-fraud exception (CCI); Crime-fraud exception (Kenney); Crime-fraud exception (Lohman); Terms of attorney retention; Reliance on foreign law; CWW substantial need and undue hardship
38	7/9/2008	Resolution	Lilly; CCI Board; CCP; LFL; MKS	Unanimous Written Consent of CCI Board	Lilly as attorney for CCI	CCI Board (self); CCP (CCI); LFL (Commissioner); MKS (Commissioner)	Nevis Act	Reliance on foreign law; Crime-fraud exception (CCI)
39	12/19/2005	Information Binder	Lilly; MKS; LFL; Abi Jaoudi; Ananaba; CCI Investments	TOC from First Amended and Restated Confidential Information Binder of CCI (1)	Lilly as attorney for CCI	MKS (Abi Jaoudi); LFL (Abi Jaoudi & G22); Abi Jaoudi (self); Ananaba (G22); CCI Investments (self)	Nevis Act	Reliance on foreign law; Crime-fraud exception (CCI); Crime-fraud exception (AJA)
40	12/19/2005	Information Binder	Lilly; MKS; LFL; Abi Jaoudi; Ananaba; CCI Investments	Summary of Offering from First Amended and Restated Confidential Information Binder of CCI	Lilly as attorney for CCI	MKS (Abi Jaoudi); LFL (Abi Jaoudi & G22); Abi Jaoudi (self); Ananaba (G22); CCI Investments (self)	Nevis Act	Reliance on foreign law; Crime-fraud exception (CCI); Crime-fraud exception (AJA)

CWW Objections to Joseph Lilly's Privilege Log of February 8, 2013								
No.	Date	Type	Authors/Recipients	Description	Party Asserting Privilege	Capacity of Other Parties (Where Applicable)	Basis for Withholding	CWW Objections
41	12/19/2005	Chart	Lilly; MKS; LFL; Abi Jaoudi; Ananaba; CCI Investments	Charts of claims and potential recoveries, included in CCI offering information binder	Lilly as attorney for CCI	MKS (Abi Jaoudi); LFL (Abi Jaoudi & G22); Abi Jaoudi (self); Ananaba (G22); CCI Investments (self)	Nevis Act	Reliance on foreign law; Crime-fraud exception (CCI); Crime-fraud exception (AJA)
42	12/19/2005	Memorandum	Lilly; MKS; LFL; Abi Jaoudi; Ananaba; CCI Investments	Memorandum outlining facts and issues re potential enforcement of Abi Jaoudi and G-22 judgments, included in CCI offering information binder	Lilly as attorney for CCI (Nevis Act) and MKS as attorney for Abi Jaoudi (Nevis Act; Work-Product Doctrine; Attorney-Client Privilege; Joint-Defense Common Interest Privilege; Litigation Privilege)	MKS (Abi Jaoudi); LFL (Abi Jaoudi & G22); Abi Jaoudi (self); Ananaba (G22); CCI Investments (self)	Nevis Act; Work-Product Doctrine; Attorney-Client Privilege; Joint- Defense Common Interest Privilege; Litigation Privilege	Crime-fraud exception (CCI); Crime-fraud exception (AJA); Communication with potential investor; Reliance on foreign law; CWW substantial need and undue hardship
43	12/19/2005	Litigation Budget	Lilly; MKS; LFL; Abi Jaoudi; Ananaba; CCI Investments	Litigation cost plan for enforcement of Abi Jaoudi and G-22 judgments, included in CCI offering information binder	Lilly as attorney for CCI (Nevis Act) and MKS as attorney for Abi Jaoudi (Nevis Act; Work-Product Doctrine; Attorney-Client Privilege; Joint-Defense Common Interest Privilege; Litigation Privilege)	MKS (Abi Jaoudi); LFL (Abi Jaoudi & G22); Abi Jaoudi (self); Ananaba (G22); CCI Investments (self)	Nevis Act; Work-Product Doctrine; Attorney-Client Privilege; Joint- Defense Common Interest Privilege; Litigation Privilege	Crime-fraud exception (CCI); Crime-fraud exception (AJA); Communication with potential investor; Reliance on foreign law; CWW substantial need and undue hardship
44	1/28/2005	Agreement	Lilly; MKS; LFL; St. Cleer; Abi Jaoudi; Ananaba	Copy of assignment of proceeds of claims from Abi Jaoudi to St Cleer LLC, containing confidential attorney-client communications and work-product	Lilly as attorney for CCI (Nevis Act) and LFL as attorney for Abi Jaoudi (Nevis Act; Work-Product Doctrine; Attorney-Client Privilege; Joint-Defense Common Interest Privilege; Litigation Privilege)	MKS (Abi Jaoudi); LFL (Abi Jaoudi & G22); St. Cleer (self); Abi Jaoudi (self); Ananaba (G22)	Nevis Act; Work-Product Doctrine; Attorney-Client Privilege; Joint- Defense Common Interest Privilege; Litigation Privilege	Crime-fraud exception (CCI); Crime-fraud exception (AJA); Funding agreement; Reliance on foreign law; CWW substantial need and undue hardship
45	1/21/2005	Agreement	Lilly; MKS; LFL; St. Cleer; Abi Jaoudi; Ananaba	Copy of assignment of proceeds of claims from Ananaba to St Cleer LLC, containing confidential attorney-client communications and work-product	Lilly as attorney for CCI (Nevis Act) and LFL as attorney for Abi Jaoudi (Nevis Act; Work-Product Doctrine; Attorney-Client Privilege; Joint-Defense Common Interest Privilege; Litigation Privilege)	MKS (Abi Jaoudi); LFL (Abi Jaoudi & G22); St. Cleer (self); Abi Jaoudi (self); Ananaba (G22)	Nevis Act; Work-Product Doctrine; Attorney-Client Privilege; Joint- Defense Common Interest Privilege; Litigation Privilege	Crime-fraud exception (CCI); Crime-fraud exception (AJA); Funding agreement; Reliance on foreign law; CWW substantial need and undue hardship
47	2/27/2005	Minutes	Lilly; CCP	Minutes of Organizational Meeting of CCI	Lilly as attorney for CCI	CCP (CCI)	Nevis Act	Reliance on foreign law; Crime-fraud exception (CCI)
48	1/15/2007	Resignation	Lilly; LFL; CCP; MKS; Ananaba	Resignation of St Cleer LLC as director of CCI	Lilly as attorney for CCI	LFL (St. Cleer); CCP (CCI); MKS (CCI); Ananaba (G22 & Abi Jaoudi)	Nevis Act	Reliance on foreign law; Crime-fraud exception (CCI); Crime-fraud exception (AJA)
49	2007	Draft Resolution	Lilly	Draft Unanimous Written Consent of the Shareholders of CCI to Amendment of Bye-laws	Lilly as attorney for CCI	n/a	Nevis Act	Reliance on foreign law; Crime-fraud exception (CCI)
50	3/19/2010	Resolution	Lilly; CCI Board; CCP; MKS	Unanimous Written Consent of CCI Board	Lilly as attorney for CCI	CCI Board (self); CCP (CCI); MKS (Commissioner)	Nevis Act	Reliance on foreign law; Crime-fraud exception (CCI)
51		Draft Resolution	Lilly	Draft unanimous consent of Liberian shareholders of CCI to election of director	Lilly as attorney for CCI	n/a	Nevis Act	Reliance on foreign law; Crime-fraud exception (CCI)
52	2007	Draft Resolution	Lilly	Draft Written Consent of the Shareholders of CCI to Amendment of Bye-laws	Lilly as attorney for CCI	n/a	Nevis Act	Reliance on foreign law; Crime-fraud exception (CCI)
54	6/30/2005	Agreement	Lilly	Amendment and Continuation of Agreement	Lilly as attorney for CCI	n/a	Nevis Act	Reliance on foreign law; Crime-fraud exception (CCI)
55	4/27/2005	Consent Award	Lilly; LFL; MKS; Ananaba; Abi Jaoudi; St. Cleer	Swiss arbitration consent award between St. Cleer, LFL, MKS, CCI and G22	Lilly as attorney for CCI	LFL (self); MKS (self); Ananaba (G22); Abi Jaoudi (self); St. Cleer (self)	Nevis Act; Swiss Law	Reliance on foreign law; Crime-fraud exception (CCI); Crime-fraud exception (AJA); Crime-fraud exception (Kenney); Crime-fraud exception (Lohman)
56	11/1/2009	Agreement	Lilly; MKS; LFL; Ananaba; Abi Jaoudi; CCI Investments	Agreement between Abi Jaoudi and G22 regarding distribution of recovery	Lilly as attorney for CCI	MKS (Commissioner); LFL (Commissioner); Ananaba (G22); Abi Jaoudi (self); CCI Investments (self)	Nevis Act	Reliance on foreign law; Crime-fraud exception (CCI); Crime-fraud exception (AJA)

## CWW Objections to Joseph Lilly's Privilege Log of February 8, 2013

No.	Date	Type	Authors/Recipients	Description	Party Asserting Privilege	Capacity of Other Parties (Where Applicable)	Basis for Withholding	CWW Objections
57	7/1/2010	Letter of Engagement	Lilly; MKS; LFL; Commissioner Sesay; Abi Jaoudi; Ananaba	Confirmation of Letter of Engagement, reflecting attorney work-product and confidential communications with client	Lilly as attorney for CCI and MKS for themselves and as attorneys for Commissioner	MKS (self & Commissioner); LFL (self & Commissioner); Commissioner (Liberia); Abi Jaoudi (self); Ananaba (G22)	Nevis Act; Work-Product; Attorney-Client; Common-Interest; Joint-Defense/Common Interest Privilege; Litigation Privilege	Crime-fraud exception (CCI); Crime-fraud exception (Kenney); Crime-fraud exception (Lohman); Terms of attorney retention; Reliance on foreign law; CWW substantial need and undue hardship